

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-01202-CJN**

PROPERTY OF THE PEOPLE, INC. et al v. DEPARTMENT
OF JUSTICE et al
Assigned to: Judge Carl J. Nichols
Cause: 05:552 Freedom of Information Act

Date Filed: 05/22/2018
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

PROPERTY OF THE PEOPLE, INC.

represented by **Jeffrey Louis Light**
LAW OFFICES OF JEFFREY LIGHT
1712 Eye Street, NW
Suite 915
Washington, DC 20006
(202) 277-6213
Fax: (202) 223-5316
Email: jeffrey@lawofficeofjeffreylight.com
ATTORNEY TO BE NOTICED

Plaintiff

RYAN NOAH SHAPIRO

represented by **Jeffrey Louis Light**
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

DEPARTMENT OF JUSTICE

represented by **Derek S. Hammond**
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2511
Fax: (202) 252-2599
Email: derek.hammond@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Katherine Boyd Palmer-Ball
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2537
Fax: (202) 252-2599
Email: katherine.palmer-ball@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-2541
Fax: (202) 252-2599
Email: joshua.kolsky@usdoj.gov
TERMINATED: 02/26/2019

Matthew Evan Kahn
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-6718
Email: matthew.kahn@usdoj.gov
TERMINATED: 11/04/2019

Defendant

**DEPARTMENT OF HOMELAND
SECURITY**
TERMINATED: 08/02/2019

represented by **Derek S. Hammond**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
(See above for address)
TERMINATED: 02/26/2019

Matthew Evan Kahn
(See above for address)
TERMINATED: 11/04/2019

Defendant

**OFFICE OF THE DIRECTOR OF
NATIONAL INTELLIGENCE**
TERMINATED: 08/02/2019

represented by **Derek S. Hammond**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
(See above for address)
TERMINATED: 02/26/2019

Matthew Evan Kahn
(See above for address)
TERMINATED: 11/04/2019

Defendant

UNITED STATES ARMY
TERMINATED: 08/02/2019

represented by **Derek S. Hammond**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
(See above for address)
TERMINATED: 02/26/2019

Matthew Evan Kahn
(See above for address)
TERMINATED: 11/04/2019

Defendant

NATIONAL SECURITY AGENCY
TERMINATED: 08/02/2019

represented by **Derek S. Hammond**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joshua M. Kolsky
(See above for address)
TERMINATED: 02/26/2019

Matthew Evan Kahn
(See above for address)
TERMINATED: 11/04/2019

Date Filed	#	Docket Text
05/22/2018	<u>1</u>	COMPLAINT against DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE (Filing fee \$ 400 receipt number 0090-5495986) filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons)(Light, Jeffrey) (Entered: 05/22/2018)
05/22/2018	<u>2</u>	LCvR 7.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROPERTY OF THE PEOPLE, INC. (Light, Jeffrey) (Entered: 05/22/2018)
05/24/2018		Case Assigned to Judge Christopher R. Cooper. (zsb) (Entered: 05/24/2018)
05/24/2018	<u>3</u>	SUMMONS (5) Issued Electronically as to DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(zsb) (Entered: 05/24/2018)
07/10/2018	<u>4</u>	AMENDED COMPLAINT against DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES ARMY, NATIONAL SECURITY AGENCY filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Attachments: # <u>1</u> Summons)(Light, Jeffrey) (Entered: 07/10/2018)
07/11/2018	<u>5</u>	SUMMONS (2) Issued Electronically as to NATIONAL SECURITY AGENCY, UNITED STATES ARMY. (ztd) (Entered: 07/11/2018)
07/27/2018	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 7/16/2018. (Answer due for ALL FEDERAL DEFENDANTS by 8/15/2018.), RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF HOMELAND SECURITY served on 7/20/2018; DEPARTMENT OF JUSTICE served on 7/16/2018; NATIONAL SECURITY AGENCY served on 7/19/2018; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE served on 7/23/2018; UNITED STATES ARMY served on 7/20/2018, RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 7/16/18. (Light, Jeffrey) (Entered: 07/27/2018)
08/15/2018	<u>7</u>	NOTICE of Appearance by Joshua M. Kolsky on behalf of DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES ARMY (Kolsky, Joshua) (Entered: 08/15/2018)
08/15/2018	<u>8</u>	ANSWER to <u>4</u> Amended Complaint, by DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES ARMY.(Kolsky, Joshua) (Entered: 08/15/2018)
02/26/2019	<u>9</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Matthew Evan Kahn on behalf of All Defendants Substituting for attorney Joshua Kolsky (Kahn, Matthew) (Entered: 02/26/2019)
06/05/2019		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. Since the requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil Procedure do not apply, it is hereby ORDERED that the parties shall confer and file a joint proposed schedule for briefing or disclosure by June 19, 2019. Signed by Judge Christopher R. Cooper on 6/5/2019. (lccrc1) (Entered: 06/05/2019)
06/06/2019		Set/Reset Deadlines: Joint Proposed Briefing Schedule due by 6/19/2019 (lsj) (Entered: 06/06/2019)

06/13/2019	<u>10</u>	Joint STATUS REPORT by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) (Entered: 06/13/2019)
06/18/2019		MINUTE ORDER: Upon consideration of the parties' <u>10</u> Joint Status Report, it is hereby ORDERED that the summary judgment briefing shall proceed as follows: Defendants shall file their motion for summary judgment by August 2, 2019; Plaintiffs shall file their opposition and cross-motion for summary judgment by September 16, 2019; Defendants shall file their reply and opposition by October 7, 2019; and Plaintiffs shall file their reply by October 28, 2019. Signed by Judge Christopher R. Cooper on 6/18/2019. (lccrc1) (Entered: 06/18/2019)
06/18/2019		Set/Reset Deadlines: Defendants' Summary Judgment motion due by 8/2/2019. Plaintiffs' Response and Cross Motion due by 9/16/2019. Defendants' Reply and Response to Cross Motion due by 10/7/2019. Plaintiffs' Reply to Cross Motion due by 10/28/2019. (kh) (Entered: 06/18/2019)
06/24/2019		Case directly reassigned to Judge Carl J. Nichols. Judge Christopher R. Cooper is no longer assigned to the case. (ztnr) (Entered: 06/24/2019)
08/02/2019	<u>11</u>	NOTICE of Voluntary Dismissal re Department of Homeland Security, Office of the Director of National Intelligence, United States Army, National Security Agency and the Bureau of Alcohol, Tobacco Firearms and Explosives (Kahn, Matthew) (Entered: 08/02/2019)
08/02/2019	<u>12</u>	MOTION for Summary Judgment by DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Exhibit, # <u>4</u> Declaration, # <u>5</u> Text of Proposed Order)(Kahn, Matthew) (Entered: 08/02/2019)
09/16/2019	<u>13</u>	Memorandum in opposition to re <u>12</u> MOTION for Summary Judgment filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Statement of Facts, # <u>3</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 09/16/2019)
09/16/2019	<u>14</u>	Cross MOTION for Summary Judgment by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Statement of Facts, # <u>3</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 09/16/2019)
10/07/2019	<u>15</u>	Consent MOTION for Extension of Time to File <i>Reply and Opposition to Plaintiff's Cross-Motion For Summary Judgment</i> by DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES ARMY (Kahn, Matthew) (Entered: 10/07/2019)
10/09/2019		MINUTE ORDER. Upon consideration of Defendant Federal Bureau of Investigation's (FBI) <u>15</u> Consent Motion for Extension of Time, it is hereby ORDERED that the Motion is GRANTED and further ORDERED (1) that Defendant FBI shall file its Reply to Plaintiffs' <u>13</u> Opposition to its <u>12</u> Motion for Summary Judgment on or before November 4, 2019; (2) that Defendant FBI shall file its Opposition to Plaintiffs' <u>14</u> Cross-Motion for Summary Judgment on or before November 4, 2019; and (3) that Plaintiffs shall file their Reply to Defendant FBI's Opposition to their <u>14</u> Cross-Motion for Summary Judgment on or before November 25, 2019. Signed by Judge Carl J. Nichols on October 9, 2019. (lccjn1) (Entered: 10/09/2019)
11/04/2019	<u>16</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Derek S. Hammond on behalf of All Defendants Substituting for attorney Matthew Kahn (Hammond, Derek) (Entered: 11/04/2019)
11/04/2019	<u>17</u>	Consent MOTION for Extension of Time to File Response/Reply by DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES ARMY (Attachments: # <u>1</u> Text of Proposed Order)(Hammond, Derek) (Entered: 11/04/2019)
11/05/2019		MINUTE ORDER. Upon consideration of Defendant FBI's <u>17</u> Consent Motion for Enlargement of Time, it is hereby ORDERED that the Motion is GRANTED and that (1) Defendant FBI shall file its Reply to Plaintiffs' <u>13</u> Opposition to FBI's Motion for Summary Judgment on or before November 18, 2019; (2) Defendant FBI shall file its Opposition to Plaintiffs' <u>14</u> Cross-Motion for Summary Judgment on or before

		November 18, 2019; and (3) Plaintiffs shall file their Reply to Defendant FBI's Opposition to Plaintiffs' <u>14</u> Cross-Motion for Summary Judgment on or before December 16, 2019. Signed by Judge Carl J. Nichols on November 5, 2019. (lccjn1) (Entered: 11/05/2019)
11/05/2019		Set/Reset Deadlines/Hearings: Defendant FBI's reply to Motion for Summary Judgment due by 11/18/2019. Defendant FBI's response to Cross Motion for Summary Judgment due by 11/18/2019. Plaintiffs' reply to Cross Motion for Summary Judgment due by 12/16/2019. (zcdw) (Entered: 11/05/2019)
11/08/2019	<u>18</u>	NOTICE of Appearance by Katherine Boyd Palmer-Ball on behalf of All Defendants (Palmer-Ball, Katherine) (Entered: 11/08/2019)
11/13/2019	<u>19</u>	Consent MOTION for Extension of Time to <i>File Response/Reply</i> by DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Palmer-Ball, Katherine) (Entered: 11/13/2019)
11/14/2019		MINUTE ORDER. Upon consideration of Defendant FBI's <u>19</u> Consent Motion for Enlargement of Time, it is hereby ORDERED that the Motion is GRANTED. It is further ORDERED that (1) Defendant FBI shall file its combined Reply to Plaintiffs' <u>13</u> Opposition to Defendant FBI's <u>12</u> Motion for Summary Judgment and Opposition to Plaintiffs' <u>14</u> Cross-Motion for Summary Judgment on or before December 5, 2019, and (2) Plaintiffs shall file their Reply to Defendant FBI's Opposition to their Cross-Motion for Summary Judgment on or before December 23, 2019. Signed by Judge Carl J. Nichols on November 14, 2019. (lccjn1) (Entered: 11/14/2019)
11/14/2019		Set/Reset Deadlines/Hearings: Defendant FBI's reply to Motion for Summary Judgment due by 12/5/2019. Plaintiffs' response to Cross Motion for Summary Judgment due by 12/5/2019. Reply to Cross Motion for Summary Judgment due by 12/23/2019. (zcdw) (Entered: 11/16/2019)
12/05/2019	<u>20</u>	Unopposed MOTION for Leave to File <i>to Submit an Ex Parte, In Camera Declaration</i> by DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Text of Proposed Order)(Palmer-Ball, Katherine) (Entered: 12/05/2019)
12/05/2019	<u>21</u>	REPLY to opposition to motion re <u>12</u> MOTION for Summary Judgment filed by DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit A (Second Declaration of David M. Hardy))(Palmer-Ball, Katherine) (Entered: 12/05/2019)
12/05/2019	<u>22</u>	Memorandum in opposition to re <u>14</u> Cross MOTION for Summary Judgment filed by DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit A (Second Declaration of David M. Hardy), # <u>2</u> Response to Plaintiffs' Statement of Material Facts, # <u>3</u> Text of Proposed Order)(Palmer-Ball, Katherine) (Entered: 12/05/2019)